



www.achievetelnet.com

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: **CC DOCKET NO. 96-45 – Appeal of Achieve Telecom Network of MA, LLC**
(Filer ID# 823002) of Universal Service Administrative Company (“USAC”)
Administrator’s Decision on Contributor Appeal, dated April 25, 2008

Dear Secretary Dortch,

In accordance with 47 C.F.R. Section 54, Subpart I and the applicable USAC Guidelines (<http://www.universalservice.org/fund-administration/contributors/file-appeal>), Achieve Telecom Network of MA, LLC hereby appeals the Administrator’s Decision on Contributor Appeal, dated April 25, 2008, which is Attachment A hereto. Therein, the Administrator of USAC denied a request to accept an amended FCC Form 499Q return for the second quarter of 2007 to correct good faith, erroneous projections for billed revenues previously reported by Achieve. As a result of the erroneous projections, Achieve has been billed to make substantial USF contributions based on revenues that it has not yet billed even to date.

The specific facts relating to and in support of this appeal are set forth in detail in the Letter to Mr. W.B. Erwin, Vice President-Finance of USAC, and the accompanying materials which are Attachment B hereto. As outlined therein, Achieve respectfully requests that in granting this appeal the Commission rescind, reverse or waive any late fees or interest imposed on outstanding invoices for USF payments due based on the erroneous reports that Achieve attempted to correct, as well as any other penalties that might be imposed on Achieve as a result of any failure to timely make these particular payments, including those imposed by the April 3, 2008 USAC letter that is part of Attachment A.

Achieve notes that the facts surrounding its appeal relating to USAC’s denial of an amended FCC Form 499Q are similar to those in the contributor appeal filed by Ascent Media Group on February 6, 2008, for which the FCC has solicited public comment. See FCC Public Notice, DA 08-1010, “Comment Sought On Ascent Media Group’s Request For Review Of A Decision By The Universal Service Administrative Company”, WC Docket No. 06-122, released April 29, 2008.

Thank for your consideration in this matter. If there are any questions, please contact me directly 781.737.1891 office, 865.414.6624 (cell), facsimile at 781.821.2236, at the corporate address at 40 Shawmut Road, Suite 200, Canton, MA 02021 or via email at joyjackson@achievetelnet.com.

Respectfully submitted

A handwritten signature in cursive script that reads 'Joy Jackson'.

Joy Jackson
Chief Executive Officer

ATTACHMENT A



Administrator's Decision on Contributor Appeal

By Certified Mail

April 25, 2008

Joy Jackson
President and Chief Executive Officer
Achieve Telecom Network of MA, LLC
40 Shawmut Road, Suite 200
Canton, MA 02120

Re: Achieve Telecom Network of MA, LLC (Filer ID # 823002)
Letters of Appeal dated January 21, 2008 and February 5, 2008

Dear Ms. Jackson:

The Universal Service Administrative Company (USAC) has completed an evaluation of your appeals submitted on behalf of Achieve Telecom Network of Massachusetts, LLC (Achieve), dated January 21, 2008 and February 5, 2008 (the Appeals). The Appeals request acceptance of a late-filed revision to Achieve's August 2007 FCC Form 499-Q (August Form 499-Q or Worksheet), and reversal of late payment fees. As discussed in more detail below, USAC hereby denies Achieve's Appeals.

Decision on Appeal: Denied

The Worksheet, which reported 4th Quarter 2007 projected revenue, had a due date of August 1, 2007 and a 45-day revision deadline of September 17, 2007. Achieve timely filed its original Worksheet on July 26, 2007 and a revision to that Worksheet on August 13, 2007. USAC processed each of the Worksheets. Achieve submitted a second revision to the Worksheet, downwardly revising its projected revenue, on January 22, 2008. USAC rejected this second revision because it was submitted after the 45-day revision deadline.

The Appeals assert Achieve reported projected revenue from a pending application with the Schools and Libraries Support Mechanism (also known as E-Rate), which had not yet been approved for funding. Achieve sought to revise its Worksheet after the revision deadline by arguing that it had not yet received Schools and Libraries Support Mechanism Funding Commitment Decision Letters (FCDLs) it had anticipated receiving. Regardless of the reason a contributor submits a revenue projection, it is responsible for paying the Universal Service Fund charges associated with that revenue projection, even if the contributor reported the information incorrectly.

As required by FCC rules,¹ USAC relied on revenue provided by Achieve on its Worksheet to calculate its universal service obligation, which posted to Achieve's October, November, and December 2007 invoices.

Federal Communications Commission (FCC) regulations require telecommunications carriers to file an annual Telecommunications Reporting Worksheet (Form 499-A or Annual Worksheet). In addition, carriers are also required to file a quarterly Telecommunications Reporting Worksheet (Form 499-Q or Quarterly Worksheet), unless they meet the *de minimis* exemption.² USAC relies on projected revenue for the upcoming quarter reported on the Quarterly Worksheet to bill contributors and relies on the Annual Worksheet to reconcile billings for the previous year. *See generally* 47 C.F.R. Part 54.

The FCC has noted timely filing of the FCC Form 499 is necessary to enable USAC to timely make its filings, which the Commission relies upon in order to determine the quarterly contribution factor.³ The FCC recently explained that it established a 45-day revision window to give contributors an opportunity to revise their quarterly Worksheets while adequately maintaining appropriate USF funding in a given quarter.⁴ USAC does not have the authority to waive the FCC-established 45-day revision deadline.

On March 19, 2008 Achieve filed a 2008 FCC Form 499-A reporting 2007 annual revenue. USAC will compare Achieve's reported actual 2007 revenue to projected estimated quarterly revenue, including the revenue projected for 4th quarter of 2007.⁵ Assuming, but not concluding, that Achieve's billings should be adjusted, Achieve will receive adjustments or credits, as appropriate, during 3rd quarter 2008.

¹ See 47 C.F.R. § 54.709 (a).

² See 47 C.F.R. § 54.708.

³ *In the Matter of Request for Review by Atlantic Digital, Inc. of Decision of Universal Service Administrator*, CC Docket No. 96-45, DA 05-520, Order, 20 FCC Rcd. 4224, 4225-26, ¶¶ 3, 5 (2005) (*Atlantic Digital*).

⁴ *See Federal-State Joint Board on Universal Service, Request for Review by: ABS-CBN Telecom North America, Incorporated of Decision of Universal Service Administrator; Southwest Communications, Inc. of Decision of Universal Service Administrator; and Trans National Communications International, Inc., Decision of Universal Service Administrator*, CC Docket Nos. 96-45, 2007 WL 784322, DA-07-1276 (2007) (*USF Reconciliation Process Order*), ¶ 2 ("Beginning in 2003, contributors have had the opportunity to correct their quarterly filings up to 45 days after the due date of each FCC Form 499-Q filing. In addition, all filers must submit an annual Telecommunications Reporting Worksheet (FCC Form 499-A), which contains the filer's actual revenues from the previous calendar year. To the extent that contributors have under- or overestimated their revenue information and have paid too little or too much, the FCC Form 499-A is used to true-up universal service billings and payments.").

⁵ *See Interim Contribution Methodology Order*, ¶ 36 ("USAC will use the actual revenue data provided by contributors on the FCC Form 499-A to perform annual true-ups to the quarterly projected revenue data submitted by contributors during the prior calendar year.").

Joy Jackson
Achieve Telecom Network of MA, LLC
April 25, 2008
Page 3 of 4

Pay and Dispute Policy

Achieve requests reversal of late payment fees assessed on any outstanding amounts due. Achieve was assessed late payment fees of \$23.53 in October 2007, \$47.06 in November 2007, \$0.87 in January 2008, \$697.06 in February 2008, \$415.40 in March 2008, and \$474.73 in April 2008. In addition, Achieve was assessed "DCIA Penalties" of \$0.93 in March, 2008 and \$885.41 in April 2008 because prior invoice balances due were unpaid for more than 90 days.⁶ Late fees and penalties will continue to be assessed and accrue until paid in full.

It is USAC's policy to enforce any late payment fees associated with unpaid balances. It is the responsibility of the contributor to file correct revenue so that USAC may accurately assess universal service fund obligations. Failure to pay USF contributions amounts when due will result in late charges being assessed on the amount outstanding.

The "Frequently Asked Questions" section of USAC's website provides guidance that specifically advises contributors that intend to file revisions to pay charges or risk receiving late payment fees. Further, the USAC website explains that USAC must rely on the contributor to deliver accurate information and that billings are based on the revenue as reported. The USAC website explains that late payment fees will not be waived unless the dispute is determined to be the result of a USAC error.⁷

Because Achieve's revised August 2007 FCC Form 499-Q was received on January 22, 2008, after the August 1, 2007 due date and the FCC-established 45-day revision window of September 17, 2007, USAC was correct in rejecting the revised Worksheet. Late fees on outstanding balances are not waived. Accordingly, Achieve's Appeals are denied.

In a letter from Ms. Joy Jackson, Achieve President and Chief Executive Officer, to USAC, dated April 17, 2008, Ms. Jackson requests a meeting with USAC to discuss Achieve's obligations and waiving assessed late payment penalties. In addition, Ms. Jackson requests that USAC extend the 30-day deadline stated in the April 3, 2008 delinquent payment letter sent to Achieve. USAC is not authorized to extend this deadline. USAC is willing to meet with representatives of Achieve at USAC's offices in Washington, D.C. or by teleconference. Ms. Jackson has been in contact with a member of USAC's Office of General Counsel. Further, we understand that Achieve's outside counsel has contacted USAC and has been directed to contact the USAC Office of General Counsel for discussions. Ms. Jackson or Achieve's outside counsel may contact USAC's Office of General Counsel to arrange this meeting.

⁶ See *Debt Collection Improvement Act of 1996*, Pub. L. No. 104-134, 110 Stat. 1321, 1358 (1996).

⁷ See USAC website section titled "Paying USAC Bill during Appeal Process" at: <http://www.usac.org/fund-administration/contributors/file-appeal/>.

Joy Jackson
Achieve Telecom Network of MA, LLC
April 25, 2008
Page 4 of 4

If you wish to further appeal this decision, you may file an appeal with the FCC. Detailed instructions for filing appeals are available at:

<http://www.universalservice.org/fund-administration/contributors/file-appeal>

Sincerely,

USAC

cc: Regina Dorsey, FCC Office of Managing Director
Hillary DeNigro, FCC Enforcement Bureau
Trent Harkrader, FCC Enforcement Bureau
Greg Guice, FCC Wireline Competition Bureau

ATTACHMENT B



STAMP IN

RECEIVED

April 17, 2008

APR 17 2008

BY HAND DELIVERY

Mr. W. B. Erwin
Vice President, Finance
Universal Service Administrative Company
2000 L Street, N.W.
Suite 200
Washington, D.C. 20036

USAC

Signature *A. Williams* 3:27pm

RE: Achieve Telecom Network of Massachusetts, LLC - Pending USF Contribution Appeal

Dear Mr. Erwin:

I am writing to request your assistance regarding a correction in certain outstanding USF contribution obligations of Achieve Telecom Network of Massachusetts, LLC ("Achieve"). Achieve is an eligible telecommunications provider under the Schools and Libraries Support Mechanism administered by USAC. As such it is subject to certain Universal Service Fund contribution requirements (Form 499 Filer ID No. 823002) and, as a result, has made substantial contributions to the USF.

In February of this year, Achieve submitted a USF contributor appeal in accordance with the applicable USAC procedures for such appeals. The appeal followed Achieve's unsuccessful attempt to modify its FCC Form 499Q covering the Second Quarter of 2007 to correct certain billed revenue projections that became the basis for significant USAC invoices for contributions due in November and December of 2007 (totaling some \$50,000).¹ Achieve has received past due notices for these amounts, which are the subject of the pending appeal.²

We have attempted to work with relevant staff regarding the issues embodied in the appeal but have been unable to realize any results to date. Therefore, I am seeking your assistance in moving toward a resolution. Achieve is not interested in shirking or avoiding its responsibilities as a contributor to USF. However, Achieve respectfully submits that it should not be penalized and forced to contribute based on revenues that it in good faith projected that Achieve would bill in the reasonable expectation that USAC would act on certain applications for E-Rate Program support, when no such billings have occurred to date.

Achieve has been billed for and made certain USF contributions based on projected billings in connection with E-Rate Program support applications that were only approved by USAC for funding in late March of this year. Moreover, in the case of at least two of those projects, because of the delay in

¹ A copy of the appeal, which includes USAC's rejection of the corrected Form 499Q, is Attachment 1 hereto.

² Copies of those notices are Attachment 2.

approving the funding, the school districts have decided not to go forward and Achieve now does not expect to be able to bill or collect that revenue.

As outlined in the appeal, Achieve respectfully submits that it should not be USAC's intentions to require or retain USF contributions that are based on projected revenues that were never billed or received by Achieve. Again, these payments were made based on projected billed revenues that Achieve included in good faith on its original August 2007 499Q filing ("Original 499Q"), but as yet have not been billed or received.

At the time that Achieve filed the Original Form 499Q, Achieve based the substantial projected gross-billed (Line 119) and project collected end-user (Line 120) revenue on the good faith assumption that the Schools and Libraries Division of USAC would be issuing Funding Commitment Decision Letter(s) ("FCDLs") for ongoing and new Priority One Telecommunications projects for Funding Year ("FY") 2007. Unfortunately, Achieve did not receive any FCDLs for these ongoing second and third year projects or for any new projects for FY 2007 Priority One Telecommunications until late March of this year. And it has yet to bill for any services provided in the interim. Furthermore, as noted above, two of the school districts, in New Haven and Hartford, have indicated that despite receiving funding approval they do not intend to go forward with these projects, either for FY 2007 or for FY 2008. Yet Achieve is faced with the prospect of severe penalties for failure to make USF contributions based on projected 2007 billed revenues that Achieve will never realize.

During the period April-October of 2007, Achieve paid about \$30,000 per month for its contributions to the USF. For a modest-sized company like ours, this is a significant sum. The requirement to continue to pay this high percentage contribution fee applicable to telecommunications service providers based on revenues that Achieve projected in good faith would be billed and received, but have not been billed or received, has consumed a majority of Achieve's cash reserves.

Achieve has timely filed its FCC Form 499A for all of 2007 and, presumably, this will permit a true up of the amounts legitimately owed by Achieve, which should be substantially adjusted. In the meantime, however, Achieve is threatened with the penalties set forth in the April 3 invoices. Achieve respectfully believes it should not be forced to make these payments in light of the foregoing circumstances and seeks your assistance in escalating the true up of Achieve's obligations and removing the prospect of these penalties.

We would request to meet with you at your earliest convenience to discuss and hopefully resolve this matter. Our preference would be to meet the week of April 28th, most preferably on April 29, May 1, or May 2.

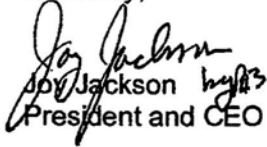
In the meantime, we would respectfully request that the 30-day deadline (i.e., May 3, 2008) reflected by the April 3 invoice be extended for another 30 days so that we hopefully can resolve this matter.

Mr. W. B. Erwin
April 17, 2008
Page 3

You may reach me via my office telephone at 888-743-1144 cell phone at 865-414-6624 or by email at joyjackson@achievetelnet.com.

Thank you in advance for your assistance.

Sincerely,


Joy Jackson
President and CEO

attachments:

1. USAC Letter of Appeal dated February 5, 2008 (with attachments)
2. USAC invoices dated April 3, 2008

Attachment 1



www.achievetelnet.com

February 5, 2008

Letter of Appeal

Universal Service Administrative Company
2000 L Street, N.W.
Suite 200
Washington, D.C. 20036

CC Docket No. 96-45

RE: Letter Of Appeal – Achieve Telecom Network of Massachusetts, LLC ("Achieve") – Filer ID No. 823002 – Contribution Year 2007

This Letter of Appeal is in response to USAC's Form 499-Q Rejection Letter dated January 23, 2008 regarding Achieve Telecom Network of MA, LLC's Revised August 2007 Filing. A copy of that letter is attached hereto.

Achieve has been billed for and made USF contributions based on projected revenues that to date have never materialized due to the lack of funding for existing and new Achieve telecommunications projects for E-rate Year 2007.

Achieve also requests at this time that USAC waive the 45-day rule that is the basis for the Letter of Rejection attached hereto and accept the revised FCC 499Q that was submitted on January 22, 2008 after discussions with USAC staff. That revised Form 499Q is attached hereto.

Achieve respectfully submits that it should not be USAC's intentions to retain contributions based on projected revenues that were never received by Achieve. Again, these payments were made based on projected revenues that Achieve included in good faith on its original August 2007 499-Q filing ("Original 499Q") (attached), not actual revenues received.

At the time that Achieve filed the Original Form 499Q, Achieve based the substantial projected gross-billed (Line 119) and project collected end-user (Line 120) revenue on the good faith assumption that the Schools and Libraries Division of USAC would be issuing Funding Commitment Decision Letter(s) ("FCDLs") for ongoing and new Priority One Telecommunications projects for Funding Year 2007. Unfortunately, Achieve has not received any FCDLs for these ongoing second and third year projects or for any new projects for Funding Year 2007 Priority One Telecommunications as of this date. Achieve has received no information at this point as to why that is the case, but Achieve has received none of the anticipated revenue that was the basis for the Original 499Q.

Achieve is a certified SBA 8(a) company and these E-Rate-supported projects currently are a substantial amount of revenue for the company. Without receiving any of that revenue it is inequitable

and impractical for Achieve to be required to continue to pay the 10-12% monthly USAC Contribution requirement, applicable to telecommunications service providers, that is based on revenues that Achieve has not received and, moreover, that at this point Achieve does not know when they might be received.


Currently, Achieve has in hand USAC invoices totaling \$50,371.78 for November and December 2007. Yet, we have not received any revenue (since June 2007 for our E-Rate-supported projects) on which those contributions are based. Despite that being the case, during the past six months (i.e., April-October of 2007), Achieve has paid a total of \$30,000 per month for its contributions to the USF. The requirement to continue to pay this high percentage contribution fee applicable to telecommunications service providers based on revenues that Achieve projected in good faith would be received, but has never been received, is consuming all of Achieve's cash reserves.

Therefore, based on the foregoing reasons, Achieve requests that USAC promptly waive the 45 day rule cited in Exhibit 1 and accept the revised FCC Form 499Q filing for the August 1, 2007 for Achieve and based thereon adjust the contribution requirements that Achieve would owe and rescind/waive any late fee that might be applied to current outstanding balances as a result. Please feel free to contact me regarding any questions or further information required in connection with this urgent Letter of Appeal.

In light of the significant burden the continued imposition of fees based on revenues to date never received is placing on Achieve, the Company requests that USAC expeditiously act on this Letter of Appeal.

You may reach me via US Mail at 40 Shawmut Road, Suite 200, Canton, MA 02021; office telephone at 888-743-1144; fax number 781-821-2236; email at joyjackson@achievetelnet.com; and cell phone at 865-414-6624.

Sincerely,


Joy Jackson
President and CEO

cc: Marcus Williams (via email)

attachments:

1. USAC Form 499Q Revision Rejection letter dated January 23, 2008
2. Revised Form 499Q Filing dated January 22, 2008
3. Original Form 499Q dated July 26, 2007



January 23, 2008

Attn: Joy Jackson
Achieve Telecom Network of MA, LLC
40 Shawmut Road
Suite 200
Canton, MA 02120

Form 499 Filer ID: 823002

RE: August 2007 FCC Form 499-Q Revision Rejection

Federal Communications Commission (FCC) regulations require carriers to file an FCC Form 499-A annually and an FCC Form 499-Q quarterly and require the Universal Service Administrative Company (USAC) to bill contributors based on reported revenues. See generally 47 C.F.R. Part 54. The August 2007 FCC Form 499-Q was due Wednesday, August 01, 2007, with revisions due by Monday, September 17, 2007 (45 days later). This 45 day form revision window is clearly noted in the instructions for the FCC Form 499 Q, is discussed in a document entitled "Helpful Hints" that was included with the form, and is posted on USAC's website www.universalservice.org. In addition, questions concerning forms and revisions can be addressed to USAC via email at Form499@universalservice.org.

Because USAC received the August 2007 FCC Form 499-Q submitted by the above-referenced Form 499 Filer ID 823002 Achieve Telecom Network of MA, LLC after the due date and outside of the 45-day revision window, the form was untimely and will not be processed.

If this submission was intended to revise revenue reported on a previously filed original Form 499-Q, please note USAC has relied upon the revenue previously projected by you for the purposes of calculating your universal service charges for October, November and December 2007. If you failed to timely file an original Form 499-Q, please note USAC has relied on revenue previously reported by you for the purpose of calculating your universal service charges for October, November and December 2007.

When a carrier fails to file an FCC Form 499 by the due date, in order to calculate universal service charges for the relevant period, FCC regulations require USAC to estimate that carrier's revenue based upon previously reported revenue information.

Please note that although you missed the revision window for submission of the Form 499-Q, the annual/quarterly (A/Q) true-up will provide a remedy. USAC's 2008 A/Q true-up will reconcile and revise contributor's account accordingly. The 2008 Form 499 A, reporting annual 2007 revenue, has a due date of April 1, 2008. Upon receipt of contributor's 2008 Form 499-A, USAC will perform the A/Q true-up and post appropriate credits or adjustments to your account.

If you wish to appeal this decision with USAC, your appeal must be postmarked no later than 60 days after the date of USAC's rejection letter. Appeals postmarked after 60 days from the date of this letter will be automatically dismissed.

In the event that you choose to appeal the decision, you should follow these guidelines:

- Write a "Letter of Appeal to USAC" explaining why you disagree with this Form 499-Q rejection letter and identify the outcome that you request.
- Be sure to refer to CC Docket No. 96-45 on all communication with the FCC.
- The appeal must identify the "Legal Reporting Name" and "Filer 499 ID".
- Provide necessary contact information. Please list the name, address, telephone number, fax number, and e-mail address (if available) of the person who can most readily discuss this appeal with USAC.
- Explain the appeal to the USAC. Please provide documentation to support your appeal.

- Attach a photocopy of this Revised Form 499-Q Rejection decision that you are appealing.
- Mail your letter to:
Letter of Appeal
USAC
2000 L Street, NW, Suite 200
Washington, DC 20036
- Appeals submitted by fax, telephone call, and e-mail will not be process

The response will indicate whether USAC:

- Agrees with your letter of appeal, and approves an outcome that is different from the Revised Form 499-Q Rejection Letter; or
- Disagrees with your letter of appeal, and the reasons therefore.

If you disagree with USAC's response to your "letter of appeal," you may file an appeal with the FCC within 60 days of the date USAC issued its decision in response to your "Letter of Appeal." Again, please note your appeal must be postmarked no later than 60 days after the date of the Appeal Decision. Appeals postmarked after 60 days from the date of USAC's response to your appeal will be automatically dismissed. The FCC rules governing the appeals process (Part 54 of Title 47 of the Code of Federal Regulations 54.719 – 54.725) are available on the FCC web site (www.fcc.gov).

Please be sure to refer to CC Docket No. 96-45 on all communication with the FCC. The appeal must also provide your company's name and Filer ID, plus necessary contact information, including the name, address, telephone number, fax number, and e-mail address of the person filing the appeal. Unless the appeal is by ECFS, please include a copy of the decision at issue.

Appeals submitted via the United States Postal Service, should be sent to the address below (For security purposes, hand-delivered or messenger-delivered documents will not be accepted at this Washington, DC address):

Federal Communications Commission
Office of the Secretary
445 – 12th Street, SW
Room TW-A325
Washington, DC 20554

Documents sent by hand-delivery or messenger should be sent to the following address:

Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743
(8:00 A.M. – 5:30 P.M. ET)

Appeals may also be submitted to the FCC electronically, either by the Electronic Comment Filing System (ECFS) or by fax. The FCC recommends filing with the ECFS to ensure timely filing. Instructions for using ECFS can be found on the ECFS page of the FCC web site. Appeals to the FCC filed by fax must be faxed to 202-418-0187. Electronic appeals will be considered filed on a business day if they are received at any time before 12:00 A.M. (midnight), Eastern Standard Time. Fax transmissions will be considered filed on a business day if the complete transmission is received at any time before 12:00 A.M.

If you have questions or concerns regarding this letter, please contact USAC Customer Service at (888) 641-8722 Option 1, Option 2.

Sincerely,

USAC

FCC Form 499-Q Telecommunications Reporting Worksheet

Quarterly Filing for Universal Service Contributors

>>> Please read instructions before completing <<<

 Approval by OMB
3060-0855

Block 1: Contributor Identification Information		101	Filer 499 ID	823002
102	Legal name of reporting entity	Achieve Telecom Network of MA, LLC		
103	IRS employer identification number	32-0061935		
104	Name telecommunications provider is doing business as	Achieve Telecom Network of MA, LLC		
105	Holding company (All affiliated companies should show same name here.)			
106	FCC Registration Number (FRN)	0008-7597-22		
107	Complete mailing address of reporting entity's corporate headquarters	Street 1 Street 2 Street 3	40 Sherwood Road Suite 200	City St Country
			Camden MA	Zip 02120

Block 2: Contact Information	
108	Person who completed this worksheet
	First Joy M D Last Jackson
109	Telephone number of this person
	(781) - 737-1891 ext
110	Fax number of this person
	(781) - 821-2236
111	Email of this person
	joyjackson@achievetelnet.com
112	Billing address and billing contact person: [Bills for Universal Service contributions will be sent to this address.]
	Street 1 Street 2 Street 3
	40 Sherwood Road Suite 200
	City Camden St MA E-Mail joyjackson@achievetelnet.com
	First Joy Ph. 781 737-1891 Fax 781 821-2236
	Last Jackson Ext

Block 3: Contributor Historical and Projected Revenue Information		
113	Year of historical revenue information	2007
114	Indicate which quarterly filing this represents	<div> <input type="checkbox"/> Filing due February 1 <input type="checkbox"/> May 1 <input checked="" type="checkbox"/> August 1 <input type="checkbox"/> November 1 </div>
	Historical revenues for	October 1 - December 31 (prior year) January 1 - March 31 April 1 - June 30 July 1 - September 30
	Projected revenues for	April 1 - June 30 July 1 - September 30 October 1 - December 31 January 1 - March 31 (following calendar year)
Historical billed revenues with no allowance or deductions for uncollectibles. See Instructions.		
115	Telecommunications provided to other universal service contributors for resale as telecommunications or as interconnected VoIP	Total Revenues (a) \$0.00
116	End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	Interstate Revenues (b) \$1,872,900.00
117	All other goods and services	International Revenues (c) \$0.00
118	Gross-billed revenues from all sources [sum of above]	Column (b) and (c) not requested for Lines 117 and 118 \$1,872,900.00
119	Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	\$762,750.00
120	Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	\$762,750.00

Block 4: CERTIFICATION: to be signed by an officer of the reporting entity	
121	I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.
	<input checked="" type="checkbox"/>
I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.	
122	Signature
123	Printed name of officer
	First Joy M D Last Jackson
124	Position with reporting entity
	President, CEO
125	Email of officer Required if available
	joyjackson@achievetelnet.com
126	Date
	07/26/2007
127	This filing is:
	<input checked="" type="checkbox"/> Original filing <input type="checkbox"/> Revised filing [revisions due within 45 days of original filing deadline]

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036

For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Infr. (888) 641-8722 or via e-mail: Form499@universalservice.org

PERSONS WILLFULLY MAKING FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

Save time, avoid problems - file electronically at

<http://forms.universalservice.org>

 FCC Form 499-Q
February 2007

FCC Form 499-Q Telecommunications Reporting Worksheet

Quarterly Filing for Universal Service Contributors

>>> Please read instructions before completing <<<

 Approval by OMB
3060-0855

Block 1: Contributor Identification Information		101	Filer 499 ID	823002
102 Legal name of reporting entity	Achieve Telecom Network of MA, LLC			
103 IRS employer identification number	32-0061935			
104 Name telecommunications provider is doing business as	Achieve Telecom Network of MA, LLC			
105 Holding company (All affiliated companies should show same name here.)				
106 FCC Registration Number (FRN)	0008-7597-22			
107 Complete mailing address of reporting entity's corporate headquarters	Street 1 Street 2 Street 3	40 Shawmut Road Suite 200	City St Country	Carlton MA Zip 02150

Block 2: Contact Information	
108 Person who completed this worksheet	First Joy M D Last Jackson
109 Telephone number of this person	(781) - 737-1891 ext
110 Fax number of this person	(781) - 821-2236
111 Email of this person	joyjackson@achievetelnet.com
112 Billing address and billing contact person. (Bills for Universal Service contributions will be sent to this address.)	Street1 40 Shawmut Road City Carlton Street2 Suite 200 St MA Zip 02150 Street3 E-Mail joyjackson@achievetelnet.com First Joy Last Jackson Ph. 781 737-1891 Ext Fax 781 821-2236

Block 3: Contributor Historical and Projected Revenue Information	
113 Year of historical revenue information	2007
114 Indicate which quarterly filing this represents	<input type="checkbox"/> Filing due February 1 <input type="checkbox"/> May 1 <input checked="" type="checkbox"/> August 1 <input type="checkbox"/> November 1
	Historical revenues for October 1 - December 31 (prior year) January 1 - March 31 April 1 - June 30 July 1 - September 30
	Projected revenues for April 1 - June 30 July 1 - September 30 October 1 - December 31 January 1 - March 31 (following calendar year)
Historical billed revenues with no allowance or deductions for uncollectibles. See instructions.	
	Total Revenues (a) Interstate Revenues (b) International Revenues (c)
115 Telecommunications provided to other universal service contributors for resale as telecommunications or as interconnected VoIP	\$0.00 \$0.00 \$0.00
116 End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	\$774,000.00 \$774,000.00 \$0.00
117 All other goods and services	\$0.00
118 Gross-billed revenues from all sources [sum of above]	\$774,000.00
Column (b) and (c) not requested for Lines 117 and 118	
119 Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	\$762,750.00 \$0.00
120 Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	\$762,750.00 \$0.00

Block 4: CERTIFICATION: to be signed by an officer of the reporting entity	
121 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules. <input checked="" type="checkbox"/>	
I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.	
122 Signature	
123 Printed name of officer	First Joy M D Last Jackson
124 Position with reporting entity	President, CEO
125 Email of officer Required if available	joyjackson@achievetelnet.com
126 Date	07/26/2007
127 This filing is:	<input type="checkbox"/> Original filing <input checked="" type="checkbox"/> Revised filing [revisions due within 45 days of original filing deadline]

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036

For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Info: (888) 641-8722 or via e-mail: Form499@universal-service.org

PERSONS WILLFULLY MAKING FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

Save time, avoid problems - file electronically at

<http://forms.universal-service.org>

 FCC Form 499-Q
February 2007

FCC Form 499-Q Telecommunications Reporting Worksheet

Quarterly Filing for Universal Service Contributors

>>> Please read instructions before completing <<<

Approval by OMB
3060-0855

Block 1: Contributor Identification Information

101

Filer 499 ID: **823002**

102 Legal name of reporting entity: **Achieve Telecom Network of MA, LLC**
 103 IRS employer identification number: **32-0061935**
 104 Name telecommunications provider is doing business as: **Same AS ABOVE**
 105 Holding company (All affiliated companies should show same name here.)
 106 FCC Registration Number (FRN): **0008-7597-22**
 107 Complete mailing address of reporting entity's corporate headquarters: **40 Shawmut RD, Ste 200
Canton, MA 02021**

Block 2: Contact Information

108 Person who completed this worksheet: First **Joy** MI **D** Last **JACKSON**
 109 Telephone number of this person: **(781)-737-1891**
 110 Fax number of this person: **(781)-821-2236**
 111 Email of this person: **joy.jackson@achievefcl.net.com**
 112 Billing address and billing contact person: **Joy Jackson**
 (Bills for Universal Service contributions will be sent to this address.) **40 Shawmut RD, Ste 200, Canton, MA 02021**

Block 3: Contributor Historical and Projected Revenue Information

113 Year of historical revenue information: Filing due
 114 Indicate which quarterly filing this represents: ☐ February 1 ☐ May 1 ☒ August 1 ☐ November 1
 Historical revenues for: October 1 - December 31 (prior year) January 1 - March 31 April 1 - June 30 July 1 - September 30
 Projected revenues for: April 1 - June 30 July 1 - September 30 October 1 - December 31 January 1 - March 31 (following calendar year)
 Historical billed revenues with no allowance or deductions for uncollectibles. See instructions.
 115 Telecommunications provided to other universal service contributors for resale as telecommunications or as interconnected VoIP: **-0-**
 116 End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues: **\$1,872,900.00**
 117 All other goods and services: **-0-**
 118 Gross-billed revenues from all sources (sum of above): **\$1,872,900.00**
 119 Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues: **-0-**
 120 Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues: **-0-**

Block 4: CERTIFICATION: to be signed by an officer of the reporting entity

121 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules. ☒

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.

122 Signature: **Joy Jackson**
 123 Printed name of officer: First **Joy** MI **D** Last **JACKSON**
 124 Position with reporting entity: **President, CEO**
 125 Email of officer (Required if available): **joy.jackson@achievefcl.net.com**
 126 Date: **1/22/08**

127 This filing is: ☐ Original filing ☒ Revised filing (revisions due within 45 days of original filing deadline)

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036
 For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Info 1-800-411-8122 or e-mail: form499@usac.universal-service.org

PERSONS WILLFULLY MAKING FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE 18 U.S.C. §1001

Save time, avoid problems - file electronically at

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FCC Form 499-Q
February 2007

APR 17 2008

USAC

Signature: **A. Williams**

3:27pm

Attachment 2



Universal Service Administrative Company
Collections Department
For billing inquiries call (888) 641-8722

April 03, 2008

Achieve Telecom Network of MA, LLC
Joy Jackson
40 Shawmut Road, Suite 200
Canton, MA 02120

Dear Contributor,

Our records indicate that as of 3/31/2008, your account (Filer 499 ID 823002) is **over 60 days past due**. This is your **second past due notice** from the Universal Service Administrative Company (USAC). The portion of your account balance that is now past due totals \$50,371.78.

**THE FOLLOWING PROVISIONS CONTAIN IMPORTANT INFORMATION AND A
DESCRIPTION OF LEGAL RIGHTS, OBLIGATIONS, AND OPPORTUNITIES.
FIRST NOTICE-DELINQUENT ACCOUNT**

1. Debtor is cautioned that its continued failure to make the demanded payment will result in further sanctions, including, but not limited to, the initiation of proceedings to recover the outstanding debt, together with any applicable administrative charges, penalties, and interest pursuant to the provisions of the Debt Collection Act of 1982 (Public Law 97-365) and the Debt Collection Improvement Act of 1996 (Public Law 104-134), as amended (the DCIA), as set forth below.

2. If we do not receive full payment within 30 days from the date of this letter (Demand Date), pursuant to the DCIA, we will transfer the full amount of the outstanding debt to the Federal Communications Commission (Commission or FCC) for debt collection. The FCC has determined that the funds are owed to the United States pursuant to the provisions of 31 USC § 3701 and 47 USC § 254. Because the unpaid amount is a debt owed to the United States, we remind you again that we are required by the DCIA to impose interest and to inform you what may happen if you do not pay the full outstanding debt. Under the DCIA, the United States will charge interest from the date of the first notice, you will be required to pay the administrative costs of processing and handling a delinquent debt as set by the Treasury (currently 18% of the debt), and you will be charged an additional penalty of 6% a year for any part of the debt that is more than 90 days past due. Interest on the outstanding debt (DCIA Interest) will be assessed at the published investment rate for the Treasury tax and loan accounts (Treasury Current Value of Funds Rate). These requirements are set out at 31 U.S.C. § 3717.

3. When we transfer the Debt, you may be subject to other administrative proceedings. Your failure to pay the Debt may be reported to credit bureaus (see 31 USC § 3711(e)), the Debt will be considered for administrative offset (see 31 USC § 3716), the Debt may be further transferred to collection agencies (see 31 USC §§ 3711 & 3718), and also the



Universal Service Administrative Company

Collections Department

For billing inquiries call (888) 641-8722

Debt may be referred to the United States Department of Justice or agency counsel for litigation. In that situation, You may be subject to additional administrative costs that result from the litigation. Moreover, pursuant to 31 USC §3720B, a person owing an outstanding nontax debt that is in delinquent status shall not be eligible for Federal financial assistance. You should be aware that the discharge of any portion of the debt may be reported to the Internal Revenue Service as potential taxable income.

Opportunities of Inspection, Review, and Repayment Agreement Have Been Waived

4. Because you failed to exercise the opportunity to inspect and copy the invoices and other records pertinent to the Debt, or to request that we review the records pertaining to the Debt, including the opportunity to present evidence that all or part of the Debt is not past due or legally enforceable, they have been waived. Moreover, you did not request the opportunity to enter into a written repayment agreement (Promissory Note) to pay the full amount of the Debt. That opportunity is also considered waived.

5. To avoid further charges or the transfer of the Debt, submit your payment by ACH or check as indicated below, or contact us immediately in writing with the date on which you will make payment by mail or facsimile transmission.

To Submit Payment

ACH Payments:

ACH payments should be sent in a CCD+ format to:
ABA Number – 071000505; Bank Account Number 59004563
Please include 499 Filer ID in your ACH

Check Payments:

Please send check payments to:
Universal Service Administrative Company
1259 Payshare Circle
Chicago, IL 60674
Please include 499 Filer ID on check

USAC Contact Information

Correspondence to USAC:

Please direct all correspondence and inquiries to the following address and fax:

USAC Billing & Disbursement
2000 L Street, N.W., Suite 200
Washington, DC 20036
Attention: Billing Department
Facsimile # (888)637-6226
Voice telephone # (888)641-8722



Universal Service Administrative Company

Collections Department

For billing inquiries call (888) 641-8722

Please also note that you are required to pay any balances owed to USAC upon receipt of an invoice. If you are awaiting a filing revision to take effect and/or awaiting a decision on an outstanding appeal to USAC, you are still obligated to pay the requisite balance due on your invoice.

Sincerely,

USAC Collections Department